

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SYNTHEGO CORPORATION,<sup>1</sup>

Debtor.

Chapter 11

Case No. 25-10823 (MFW)

**Related Docket No.**

**ORDER SUSTAINING DEBTOR'S FIRST OMNIBUS OBJECTION  
(SUBSTANTIVE) TO CERTAIN CLAIMS (REDUCED CLAIMS, NO LIABILITY  
CLAIMS, AMENDED CLAIMS, AND RECLASSIFIED CLAIM)**

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Upon consideration of the *Debtor's First Omnibus Objection (Substantive) to Certain Claims (Reduced Claims, No Liability Claims, Amended Claims, and Reclassified Claim)* (the "Objection")<sup>2</sup> for entry of an order (this "Order") pursuant to section 502 of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1, objecting to the claims listed on **Schedule 1** (the "Reduced Claims"), **Schedule 2** (the "No Liability Claims"), **Schedule 3** (the "Amended / Superseded Claims"), and **Schedule 4** (the "Reclassified Claim") all as more fully set forth in the Objection; and the Court having reviewed the Declaration in support of the Objection; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Objection and of the hearing on the Objection

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<sup>1</sup> The Debtor's mailing address is 3696 Haven Avenue, Suite A, Redwood City, California, 94063, and the last four digits of the Debtor's federal tax identification number is 9518.

<sup>2</sup> Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Objection.

was sufficient under the circumstances and in full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Objection is SUSTAINED as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. Each Reduced Claim identified on **Schedule 1** attached hereto is hereby reduced in amount as set forth in the column titled “Reduced Claim Amount.”
4. Each No Liability Claim identified on **Schedule 2** attached hereto is hereby disallowed and expunged in its entirety.
5. Each Amended / Superseded Claim identified on **Schedule 3** attached hereto in the column titled “Amended Claims to be Disallowed” is hereby disallowed and expunged in its entirety.
6. The Reclassified Claim identified on **Schedule 4** attached hereto is hereby reclassified in full, as a general unsecured claim as set forth in the column titled “Reclassified Claim Amount.”
7. The claims and noticing agent is authorized to update the claims register to reflect the relief granted in this Order.
8. The Debtor’s right to object in the future to any of the Claims listed in the Objection on any ground, including, without limitation, substantive grounds, and to amend,

modify or supplement the Objection, including, without limitation, to object to amended claims and newly-filed claims, is hereby reserved.

9. Each of the Claims and the objections by the Debtor to such Claims, as addressed in the Objection and set forth on **Schedule 1**, **Schedule 2**, **Schedule 3**, and **Schedule 4** attached to this Order, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each of the Claims. Any stay of this Order shall apply only to the contested matter that involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.

10. The Debtor and Epiq Corporate Restructuring, LLC are authorized to take all actions necessary to effectuate the relief granted in this Order.

11. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

12. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**SCHEDULE 1**

**Reduced Claims**

## Schedule 1

### Reduced Claims

No.	Name of Claimant	Date Claim Filed	Claim Number	Asserted Claim Amount	Basis for Proposed Modification	Modified Claim Amount
1	Donnelley Financial Solutions 390 Steel Way Lancaster, PA 17601	5/19/2025	10008	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$161,445.50 Total: \$161,445.50	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$160,195.50 Total: \$160,195.50
2	Wells Fargo Vendor Financial Servic 801 Walnut Street, MAC F0006-052 Des Moines, IA 50309	6/4/2025	10011	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$28,326.89 Total: \$28,326.89	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,038.88 Total: \$1,038.88
3	Linde Gas & Equipment Inc. C/O BARR Credit Services 3444 N Country Club Rd Ste 200 TUCSON, AZ 85716	6/16/2025	10014	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$7,181.05 Total: \$7,181.05	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$6,805.78 Total: \$6,805.78
4	PACIFIC BIOLABS, INC. 551 Linus Paulding Drive Hercules, CA 94547	6/18/2025	10018	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$3,186.00 Total: \$3,186.00	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$30.68 Total: \$30.68
5	NOR-CAL MOVING SERVICE 3527 ARDEN ROAD HAYWARD, CA 94545	6/19/2025	10020	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,843.64 Total: \$1,843.64	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,506.64 Total: \$1,506.64
6	Penske Truck Leasing Co., L.P. PO Box 563 Reading, PA 19603	7/1/2025	10038	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$2,272.65 Total: \$2,272.65	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$272.65 Total: \$272.65
7	Cintas Corporation ATTN Stephen Malkiewicz, BK COUNSEL 6800 Cintas Blvd Mason, OH 45040	7/2/2025	10043	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$2,206.45 Total: \$2,206.45	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,887.09 Total: \$1,887.09
8	Fisher Scientific Company, L.L.C. C/O Beverly Weiss Manne 1500 One PPG Pl Pittsburgh, PA 15222	7/2/2025	10045	503(b)(9): \$0.00 Other Administrative: \$5,314.88 Secured: \$0.00 Priority: \$0.00 Unsecured: \$73,796.37 Total: \$79,111.25	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$5,314.88 Secured: \$0.00 Priority: \$0.00 Unsecured: \$47,020.09 Total: \$52,334.97
9	Technology Networks Ltd. 334 King Street, Unit 2 Midland, ON, L4R 3M8 Canada	7/2/2025	10050	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$41,435.63 Total: \$41,435.63	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$29,750.00 Total: \$29,750.00

No.	Name of Claimant	Date Claim Filed	Claim Number	Asserted Claim Amount	Basis for Proposed Modification	Modified Claim Amount
10	LabX Media Group Inc. 334 King Street, Unit 2 Midland, ON, L4R 3M8 Canada	7/2/2025	10051	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$14,950.00  Total: \$14,950.00	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$11,500.00  Total: \$11,500.00
11	Bio-Rad Laboratories, Inc. 1000 Alfred Nobel Dr., MS 1-130 Hercules, CA 94547	7/2/2025	10054	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$5,530.17  Total: \$5,530.17	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$4,616.42  Total: \$4,616.42
12	Thomas Scientific, LLC ATTN Angela Hipple, SVP, Controller PO Box 99 Swedesboro, NJ 08085  <u>Notice Party</u> David J. Kozlowski, Esq. Morrison Cohen LLP 909 Third Avenue, 27th Floor New York, NY 10022-4784	7/2/2025	10055	503(b)(9): \$0.00 Other Administrative: \$3,732.18 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,182,770.10  Total: \$1,186,502.28	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$3,732.18 Secured: \$0.00 Priority: \$0.00 Unsecured: \$0.00  Total: \$3,732.18
13	Life Technologies Corporation C/O Beverly Weiss Manne 1500 One PPG Pl Pittsburgh, PA 15222	7/3/2025	10060	503(b)(9): \$0.00 Other Administrative: \$597.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$13,489.68  Total: \$14,086.68	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$313.50  Total: \$313.50
14	Global Life Sciences Solut. USA LLC 100 Results Way Marlborough, MA 01752	7/3/2025	10062	503(b)(9): \$0.00 Other Administrative: \$1,483.22 Secured: \$0.00 Priority: \$0.00 Unsecured: \$30,461.98  Total: \$31,945.20	The amount asserted in the Claim does not match the Debtor's books and records and overstates the amount for which the Debtor's estate is liable.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$2,298.38  Total: \$2,298.38

**SCHEDULE 2**

**No Liability Claims**



## Schedule 2

### No Liability Claims

No.	Name of Claimant	Date Claim Filed	Claim Number	Asserted Claim Amount	Basis for Proposed Disallowance
1	PG&E PO Box 8329 CO Bankruptcy Stockton, CA 95208	6/17/2025	1	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$29,801.94  Total: \$29,801.94	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
2	SIGMA-ALDRICH INC 3050 Spruce Street St. Louis, MO 63103	6/17/2025	2	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$12,004.00  Total: \$12,004.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
3	CIRCUITS & SYSTEMS INC c/o Arlyn Scales 59 2nd Street East Rockaway, NY 11518	6/23/2025	4	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$600.00  Total: \$600.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
4	MICHELLI MEASUREMENT GROUP 130 BROOKHOLLOW ESPLANADA HARAHAN, LA 70123	6/26/2025	8	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,083.50  Total: \$1,083.50	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
5	STEMCELL Technologies Inc. 6425 S 216th St Kent, WA 98032	6/23/2025	10025	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,141.00  Total: \$1,141.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
6	DUMLAO, JASON <i>Address redacted</i>	6/25/2025	10028	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$0.00  Total: \$0.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
7	ERS Genomics Limited C/O Nixon Peabody LLP ATTN Louis J Cisz III One Embarcadero Center, 32nd Floor San Francisco, CA 94111	6/27/2025	10032	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$1,558,783.00  Total: \$1,558,783.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.

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8	PRECISION METAL TOOLING, INC. 5101 SAN LEANDRO STREET OAKLAND, CA 94601	7/2/2025	10046	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$19,450.00  Total: \$19,450.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
9	CHEMGENES CORPORATION 33 INDUSTRIAL WAY WILMINGTON, MA 01887	7/2/2025	10048	503(b)(9): \$0.00 Other Administrative: \$1,917.30 Secured: \$0.00 Priority: \$0.00 Unsecured: \$0.00  Total: \$1,917.30	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
10	Workday, Inc. C/O Perkins Coie LLP ATTN Bradley A. Cosman 2525 E Camelback Rd, Ste 500 Phoenix, AZ 85016	7/2/2025	10049	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$30,596.00  Total: \$30,596.00	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
11	Iron Mountain Information Mgmt LLC ATTN Joseph P Corrigan 1101 Enterprise Dr Royersford, PA 19468	7/2/2025	10053	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$2,727.02  Total: \$2,727.02	A review of the Debtor's books and records reveals no indication that the asserted claim amount is due and owing.
12	Colorado Department of Revenue Attn: Bankruptcy PO Box 17087 Denver, CO 80217-0087	6/9/2025	10012	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$0.00  Total: \$0.00	The Claimant filed a proof of claim reflecting no amount due, asserting a claim in the amount of \$0.00.

**SCHEDULE 3**

**Amended / Superseded Claims**

### Schedule 3

*Amended / Superseded Claims*

Amended Claims to Be Disallowed						Remaining Claims		
No.	Name of Claimant	Date Claim Filed	Claim Number	Total	Basis for Proposed Disallowance	Date Claim Filed	Claim Number	Total
1	EATON CORPORATION ATTN GLOBAL TRADE CREDIT 1000 EATON BOULEVARD, S5 CLEVELAND, OH 44122	6/19/2025	3	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$12,044.32  Total: \$12,044.32	Claim No. 3 and Claim No. 13 appear to be duplicates.	6/30/2025	13	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$12,044.32  Total: \$12,044.32
2	PACIFIC BIOLABS, INC. 551 Linus Pauling Drive Hercules, CA 94547	6/18/2025	10018	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$3,186.00  Total: \$3,186.00	Claim No. 10019 amends Claim No. 10018.	6/18/2025	10019	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$3,216.68  Total: \$3,216.68

**SCHEDULE 4**

**Reclassified Claim**

#### Schedule 4

##### *Reclassified Claim*

No.	Name of Claimant	Date Claim Filed	Claim Number	Asserted Claim Amount	Basis for Proposed Reclassification	Reclassified Claim Amount
1	Genie Scientific 17430 MT CLIFFWOOD CIR FOUNTAIN VALLEY, CA 92708	6/19/2025	10022	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$6,074.44 Unsecured: \$0.00  Total: \$6,074.44	The Claim and its supporting documents do not demonstrate entitlement to an administrative claim under section 507(a)(7) and, accordingly, the claim should be reclassified as a general unsecured claim.	503(b)(9): \$0.00 Other Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 Unsecured: \$6,074.44  Total: \$6,074.44